

244-08/MEU
FREEHILL HOGAN & MAHAR, LLP
Attorneys for Defendant
SK SHIPPING (SINGAPORE) PTE LTD.
80 Pine Street
New York, NY 10005
Telephone: (212) 425-1900
Facsimile: (212) 425-1901
Michael E. Unger (MU 0045)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SPECTRA NAVIGATION LTD.,

Plaintiff,

- against -

08 CV 3746 (WHP)

VERIFIED ANSWER

SK SHIPPING (SINGAPORE) PTE LTD.,

Defendant.
-----X

Defendant SK SHIPPING (SINGAPORE) PTE LTD. (hereinafter "SK") through its attorneys Freehill, Hogan & Mahar, LLP, responds, upon information and belief, to the Verified Complaint of Plaintiff SPECTRA NAVIGATION LTD. (hereinafter "SPECTRA") as follows:

1. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 1 of the Verified Complaint.

2. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 2 of the Verified Complaint.

3. ADMITS that upon information and belief, at all material times, Defendant was a foreign corporation or other business entity organized and existing under foreign law and was the Charterer of the Vessel, but except as so specifically

ADMITTED, DENIES each and every allegation contained in Paragraph 3 of the Verified Complaint.

4. ADMITS the allegations contained in Paragraph 4 of the Verified Complaint.

5. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 5 of the Verified Complaint.

6. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 6 of the Verified Complaint.

7. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 7 of the Verified Complaint.

8. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 8 of the Verified Complaint.

9. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 9 of the Verified Complaint.

10. DENIES knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 10 of the Verified Complaint.

11. DENIES each and every allegation contained in Paragraph 11 of the Verified Complaint.

12. DENIES each and every allegation contained in Paragraph 12 of the Verified Complaint.

13. DENIES each and every allegation contained in Paragraph 13 of the Verified Complaint.

14. ADMITS the allegations contained in Paragraph 14 of the Verified Complaint.

15. ADMITS the allegations contained in Paragraph 15 of the Verified Complaint.

16. DENIES each and every allegation contained in Paragraph 16 of the Verified Complaint.

17. DENIES each and every allegation contained in Paragraph 17 of the Verified Complaint.

18. DENIES each and every allegation contained in Paragraph 18 of the Verified Complaint.

19. DENIES each and every allegation contained in Paragraph 19 of the Verified Complaint.

**FURTHER ANSWERING THE COMPLAINT AND AS AND FOR SEPARATE
PARTIAL AND OR COMPLETE DEFENSES THERETO, DEFENDANT PORL
ALLEGES UPON INFORMATION AND BELIEF AS FOLLOWS:**

20. The Verified Complaint fails to state a cause of action upon which relief may be granted.

21. Plaintiff has improperly and /or insufficiently served process upon Defendant.

22. Plaintiff has failed to mitigate its damages.

23. Venue is improper before this Court.

24. This matter should be dismissed under the doctrine of *forum non conveniens*.

25. Any damages, if any, suffered by Plaintiff, which are denied, were caused by the contributory negligence of the Plaintiff or others.

26. This matter is subject to arbitration and the matter should be dismissed or stayed in favor of arbitration at London pursuant to the agreement of the parties.

Dated: New York, New York
April 29, 2008

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Defendant
SK SHIPPING (SINGAPORE) PTE LTD.

By: 

Michael E. Unger (MU0045)
80 Pine Street
New York, NY 10005-1759
Telephone: 212 425-1900
Facsimile: 212 425-1901

TO:

TISDALE LAW OFFICES LLC
Attorney for Plaintiff
SPECTRA NAVIGATION LTD.
Claurisse Campanale Orozco (CC 5263)
11 West 42nd Street, Suite 900
New York, New York 10036
Tel: (212) 354-0025
Fax: (212) 869-0067

ATTORNEY VERIFICATION


State of New York)
) ss.:
County of New York)

MICHAEL E. UNGER, being duly sworn, deposes and says as follows:

1. I am a member of the law firm of Freehill Hogan & Mahar, LLP, attorneys for Plaintiff in this action, I have read the foregoing Verified Answer and know the contents thereof, and the same is true to the best of my knowledge, information and belief.


2. The sources of my information and the grounds for my belief are communications, information and documentation provided by our client and/or by solicitors representing our client.

3. The reason this verification is made by an attorney and not by the Defendant is because the Defendant is a foreign entity, none of whose officers are presently within this Judicial District.



Michael E. Unger

Sworn to before me this
29th day of April 2008



Notary Public

JOAN SORRENTINO
Notary Public, State of New York
No. 01SO6067227
Qualified in New York County
Commission Expires December 3, 2009

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
SS.:
COUNTY OF NEW YORK)

MELISSA COLFORD, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and resides in
 RICHMOND COUNTY, CITY AND STATE OF NEW YORK.

On the 29 day of April, 2008, deponent served the within **VERIFIED ANSWER** upon:

TISDALE LAW OFFICES LLC
Attorney for Plaintiff
SPECTRA NAVIGATION LTD.
Claurisse Campanale Orozco (CC 5263)
11 West 42nd Street, Suite 900
New York, New York 10036
Tel: (212) 354-0025
Fax: (212) 869-0067

by depositing a true copy of same enclosed in a post-paid properly addressed wrapper, in a post office official depository under the exclusive care and custody of the United States Postal Service within the State of New York and by ECF.

MELISSA COLFORD

Sworn to before me on the
29th day of April, 2008

~~NOTARY PUBLIC~~

JOAN SORRENTINO
Notary Public, State of New York
No. 01SO6067227
Qualified in New York County
Commission Expires December 3, 2009